

**IN THE SUPREME COURT OF FLORIDA**

THE FLORIDA BAR,

Complainant,

Case No. SC20-1027

v.

ALAN HOWARD RAMER,

The Florida Bar File No.  
2019-70, 706 (11E)

Respondent.

\_\_\_\_\_/

**MOTION TO SUPPLEMENT RECORD**

Pursuant to Rule 3-7.6(n)(4) of the Rules Regulating The Florida Bar (“RRTFB”) and Florida Rule of Appellate Procedure 9.300, Complainant The Florida Bar (“TFB”) moves the Court to allow supplementation of the Record submitted by the Referee and in support thereof states as follows:

1. TFB filed a Formal Complaint for Reciprocal Discipline against Respondent Alan Howard Ramer (“Respondent”) on July 16, 2020.
2. A Referee was appointed, proceedings were held, and the Report of Referee was filed on May 5, 2021. The Referee also filed the Index of Record on May 5, 2021.

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3. TFB timely filed a Notice of Intent to Seek Review of Report of Referee on July 1, 2021. Later that same day, Respondent filed a Cross-Notice of Intent to Seek Review of the Report of Referee.

4. TFB's Initial Brief is due August 2, 2021. During the course of preparation, counsel for TFB realized that TFB's and Respondent's proposed reports of referee ("Proposed Reports") did not appear to be included in the Record filed with the Court on May 5, 2021.

5. TFB believes the Court should have the benefit of the Proposed Reports, which were requested, received, and considered by the Referee prior to her issuing the Report of Referee, which was docketed on May 5, 2021.

6. Moreover, the Proposed Reports squarely fall within the directive found in Rule 3-7.6(n)(2), which requires the inclusion of "all items properly filed in the cause."

7. Rule 3-7.6(n)(4) does state that motions to supplement the record should be filed within 15 days of service of the Index, and more than 15 days have passed since TFB received a copy of the Index. Nevertheless, TFB files this Motion so the Court may have the benefit of a complete Record.

8. Pursuant to Rule 9.300(a), the undersigned corresponded with counsel for Respondent via email. Counsel for Respondent is concerned inclusion of the Proposed Reports in the Record may be confusing, as the Referee asked each side to prepare the Proposed Reports after she announced the recommended discipline.

9. TFB has attached an Appendix to this Motion with the two Proposed Reports for this Court's consideration.

10. This Motion is not brought for purposes of delay, as TFB intends to file its Initial Brief on August 2, 2021 as scheduled.

Dated July 27, 2021.

**HOLLAND & KNIGHT LLP**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 27, 2021, a true and correct copy of the forgoing was filed through the Florida Courts E-Filing Portal and served by email to the following:

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